

**MITT ROMNEY** 

GOVERNOR

KERRY HEALEY

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#### THE COMMONWEALTH OF MASSACHUSETTS

# DEPARTMENT OF TELECOMMUNICATIONS & ENERGY

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April 20, 2006

VIA EMAIL AND USPS

Gary Epler Senior Counsel 6 Liberty Lane West Hampton NH 03842-1720

RE: Petition of Fitchburg Gas and Electric Light Company for approval of a change

in the method by which the Company recovers its gas and electric bad debt

costs, D.T.E. 05-GAF-P4/06-28

Dear Attorney Epler:

Enclosed please find the first set of information requests issued by the Department of Telecommunications and Energy to Fitchburg Gas and Electric Light Company d/b/a Unitil in the above-captioned matter. Please submit the Company's responses to the Department on or before 5:00 p.m., Thursday, May 4, 2006. If you have any questions regarding the information requests, please contact me at 617-305-3561.

Sincerely,

/s/

Carol M. Pieper Hearing Officer

Encs.

cc: Service List (w/encs.)

FAX: (617) 345-9101 TTY: (800) 323-3298 www.mass.gov/dte

## COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

FIRST SET OF INFORMATION REQUESTS OF THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO FITCHBURG GAS AND ELECTRIC LIGHT COMPANY, D.T.E. 05-GAF-P4/06-28

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy ("Department") submits to Fitchburg Gas and Electric Light Company d/b/a Unitil ("Fitchburg" or "Company") the following Information Requests.

### **Instructions**

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department in this proceeding.

- 1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case, and the name of the person responsible for the answer.
- 2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
- 3. These requests shall be deemed continuing so as to require further supplemental responses if Fitchburg or its witnesses receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
- 4. The term "provide complete and detailed documentation" means:
  - Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers.
- 5. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

- 6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
- 7. Please file one copy of the responses with Mary L. Cottrell, Secretary of the Department; also submit two (2) copies of the responses to Carol Pieper, Hearing Officer, one (1) copy of the responses to Thomas Carey, Analyst, Rates Division, one (1) copy of the responses to Mauricio Diaz, Analyst, Rates Division, and one (1) copy of the responses to Alexander Kofitse, Analyst, Gas Division.
- 8. In addition to filings, all non-proprietary responses should be submitted by e-mail to <a href="mailto:dte.efiling@state.ma.us">dte.efiling@state.ma.us</a> and to the e-mail address of any party required to be served.
- 9. Responses are due on or before Thursday, May 4, 2006.

### **Requests**

- DTE-1-1 Please refer to the Company's filing for recovery of electric supply-related bad debt dated February 24, 2006. On Attachment 1 at page 1, the Company has included a column titled "Net Write-offs as included in Default & Standard Offer Service" for the years 2003-2005. Please indicate the source and derivation of these amounts including all supporting calculations, schedules, and assumptions.
- DTE-1-2 Please explain the manner in which the Company determines its net write-offs including the Company's policy on when uncollected costs are written-off.
- DTE-1-3 Please refer to the Company's filing for recovery of electric supply-related bad debt dated February 24, 2006. On Attachment 2, at page 1, Fitchburg lists revenue, total write-offs, total recoveries, and net write-offs for years 2002-2005. Provide a monthly breakdown of these categories for the year 2005. In addition, provide similar information on a monthly basis as available for the year 2006.
- DTE-1-4 Please provide an analysis of the activity in Account 260, Reserve for Uncollectible Accounts, for the years 2003, 2004, and 2005. In complying with this request, please separate the annual bad debt accruals, write-offs and recoveries between the electric and gas departments.
- DTE-1-5 Please refer to the Company's filing for recovery of gas-related bad debt dated December 15, 2005, at page 4. Given that Fitchburg is not under a Performance-Based Ratemaking ("'PBR") Plan, please explain the basis on

which the Company asserts it qualifies to recover its under-recovered bad debt costs for the calendar year 2005 as exogenous costs.

DTE-1-6 Please refer to the Company's filing for recovery of gas-related bad debt dated December 15, 2005, at page 6, footnote 4, and Attachment 2. Please perform any pro forma adjustments to account for weather normalization in the calculations.

Dated: April 20, 2006